

Application No.: 09/800,100**Docket No.: 30007696 US (1509-149)****REMARKS**

The title has been amended so it is consistent with the claimed subject matter.

Claims 21-33 and 45-47 are presented in the same form as originally submitted and claims 48-53 are added to provide applicants with the protection to which they are deemed entitled.

Applicants traverse the rejection of the pending claims as being obvious under 35 USC 103 (a) as result of Momona (U.S. 5,115,660) and Matsuda et al. (U.S. Patent Publication 2002/0133573).

The office action states Momona discloses a method of configuring a plurality of computer entities into a plurality of groups, wherein one of the computer entities is a master computer entity of a particular group and at least one of the other computer entities is a slave computer entity candidate of the particular group. While Momona discloses a system including master and slave computer entities, applicants cannot agree that Monona discloses a method of configuring a plurality of such computer entities into a plurality of groups, as alleged in the office action with regard to each of independent method claims 21, 23 and 25. From column 1, lines 8-53, Momona is concerned with a polling method for a multiple access communication system. In the prior art to Momona, a master station transmits a polling signal to plural slave stations via a broadcast channel. The polling signal includes address information of an addressed slave station and information regarding the amount of channel allocation for that slave station. Upon receiving the polling signal, each slave station transmits, to the master station, data indicative of the amount of its current channel allocation and the amount of channel allocation required for the next communication. As slave stations are added to the system, there is an increase in the number of slave stations that transmit no data to the master station, resulting in a

Application No.: 09/800,100**Docket No.: 30007696 US (1509-149)**

delay in transmission from slave stations having data to be transmitted to the master station. To avoid this problem, Momona proposed that the master station transmit the polling signal only to the slave stations that are to respond to the master station. Based on the foregoing, applicants are unable to understand how Momona discloses a method of configuring plural computer entities into plural groups. If the Examiner persists in stating Momona discloses a method of configuring plural computer entities into plural groups, wherein one of the computer entities is a master and at least one of the other computer entities is a slave, she is requested to indicate the specific portion of Momona disclosing configuring plural computer entities into plural groups and to explain the basis for such a conclusion.

In rejecting claims 21, 23 and 25, as well as independent apparatus claim 27, the office action relies on column 5, lines 15-32 of Momona to disclose a storage device of a master computer entity being arranged to provide functionality of the master computer entity to one or more slave or second computer entities. However, the relied upon portion of Momona is concerned with the initial phase of a polling operation from a master computer to slave computers. It is not seen where column 5, lines 15-32 of Momona has anything to do with a master computer providing functionality to other computers. If the Examiner persists in stating column 5, lines 15-32 of Momona discloses a master computer that provides functionality to other computers, she is requested to explain the basis for such rationale.

In the rejection of independent method claims 21, 23 and 25, as well as apparatus claim 27, the office action states paragraphs 0034 and 0043 of Matsuda disclose a master slave relationship between computer entities. The office action also relies on these two paragraphs to disclose the requirements of claims 21, 23, 25 and 27 for attempting to set a slave computer entity candidate of a particular group to have an equivalent functionality to a user as a master

Application No.: 09/800,100**Docket No.: 30007696 US (1509-149)**

computer entity of a particular group. However, the portions of Matsuda relied upon to disclose a master slave relationship and attempting to set a slave computer entity candidate to have an equivalent functionality to a user as a master computer, that is, paragraphs 0034 and 0043, have no mention of either of these features.

Paragraph 0034 of Matsuda is concerned with a networked office appliance (NOA) architecture for providing mechanisms for automatically configuring devices on networks, such as Transmission Control Protocol/Internet Protocol (TCP/IP) networks. The configuration methods include network address allocation, Domain Name Service (DNS) database population, network service discovery, and user identity sharing. Paragraph 0034 indicates Dynamic Host Configuration Protocol (DHCP) and DNS services work together to provide names and addresses to network devices on the same network without human intervention. In addition, a hypertext transfer protocol (HTTP) based method of security sharing service information, as well as user group information, is defined. Paragraph 0043 indicates non-NOA server 210 is not configured to provide DHCP services to network 201, in which case client NOA 200 broadcasts a DHCP Discover across network 201 and delays for a specific time interval at processing block 324 before broadcasting subsequent DHCP Discover across network 2001. Error processing is discussed in the remainder of paragraph 0043. Based on foregoing, the allegations in the office action regarding paragraphs 0034 and 0043 appear to be erroneous. If the Examiner persists in stating paragraphs 0034 and 0043 of Matsuda disclose a master slave relationship and/or attempt to set a slave computer entity candidate of a particular group to have an equivalent functionality to a user as a master computer entity of a particular group, she is requested to explain the basis for such a conclusion.

Application No.: 09/800,100**Docket No.: 30007696 US (1509-149)**

Based on the foregoing, the rejection of independent claims 21, 23, 25 and 27 is incorrect. In addition, there are incorrect statements in the office action regarding the disclosures in paragraphs 0049, 0056, 0064 and 0066 of Matsuda.

To reject claim 21, the office action erroneously states paragraph 0049 of Matsuda discloses checking whether the slave computer entity candidate of a particular group has the same security mode setting as the master computer entity of the particular group. To reject claim 23, the office action states paragraph 0049 of Matsuda discloses checking whether the slave computer entity candidate of a particular group has functionality to a user that is the same as a master computer entity of a particular group. However, paragraph 0049 makes no mention of the security mode settings or functionality to a user, no less checking whether the slave computer entity candidate has the same security mode setting or functionality to a user as a master computer entity. Paragraph 0049 merely indicates non-networked office appliance (NOA) 200 broadcasts a DHCP Discoverer across network 201 if non-NOA server 210 is not configured to provide DHCP or equivalent services to network 201. If the Examiner persists in stating paragraph 0049 of Matsuda discloses the foregoing checking requirements of claims 21 and 23, she is requested to explain the basis for such a conclusion.

To reject each of claims 21 and 23, the office action relies on paragraph 0056 of Matsuda to disclose preventing a slave computer entity candidate of a particular group from being a member of the particular group if the slave computer entity candidate does not have the same (1) security setting (claim 21) and (2) domain (claim 23). Paragraph 0056 refers to user intervention if the state variable of server NOA 402 is not equal to the Master or Initial state variable discussed in paragraph 0055 in connection with automatic operation of server NOA 402. The user intervention occurs in response to server NOA 402 not receiving a DHCP offer at

Application No.: 09/800,100**Docket No.: 30007696 US (1509-149)**

processing block 506 before a predefined amount of time allocated for the expiration of a DHCP response at processing block 508. Thus, it is not seen how paragraph 0056 of Matsuda has anything to do with the foregoing preventing steps of claims 21 and/or 23.

To reject the requirement of claim 25 to determine if the master computer entity can use UDP broadcast based IP provisioning to connect a slave computer entity candidate of a particular group by name in response to a master computer entity of the same group and a slave computer candidate having a DHCP configuration, the office action relies on paragraphs 0056 and 0064. Paragraph 0056 of Matsuda has nothing to do with the foregoing requirement of claim 25, as the previous discussion of paragraph 0056 in connection with claims 21 and 23 reveals. Paragraph 0064 of Matsuda indicates the DHCP server on server NOA 402 includes a table that records network name complex and assignments. The table keeps track of a device's Media Access Control (MAC) address and the corresponding network name binding, that is, network name complex and assignments. The table also includes fields for such information as the IP address of the device and the name in use code, which is initialized upon bootstrap to indicate whether a particular host name is being used by another device. Thus, paragraph 0064 of Matsuda appears to have nothing to do with the requirements of claim 25 discussed in the first sentence of this paragraph.

The second and third "bullets" at the top of page 9 of the office action seem to imply that claim 25 requires checking whether a slave computer entity candidate has the same domain as a master computer entity and that a slave computer entity candidate is prevented from being a member of a group if the candidate does not have the same domain as the master. However, claim 25 does not include the word "domain." Explanation is therefore requested with regard to this aspect of the rejection of claim 25.

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Application No.: 09/800,100**Docket No.: 30007696 US (1509-149)**

The first "bullet" at the top of page 9 of the office action states Matsuda discloses the step of preventing a slave computer entity candidate of a particular group from being a member of the group in response to the candidate being determined not to have a DHCP configuration. However, no portion of Matsuda is relied upon to disclose this step and applicants are unaware of any portion of Matsuda disclosing such a step.

The office action relies on paragraphs 0064 and 0066 of Matsuda to disclose the requirement of claim 27 relating to preventing a headless slave computer candidate from being a member of a group if the candidate does not have the same operating characteristics as a predetermined operating characteristic of a first headless master computer entity. As discussed supra, paragraph 0064 of Matsuda has nothing to do with preventing a slave computer candidate from being a member of a group. Paragraph 0066 of Matsuda indicates that NOA 402 records a mark in a name in use field, to indicate that a network name assigned to client NOA 400 has been taken. As a result, no other device can attempt to use the network name assigned to client NOA 400. The DHCP server, NOA 402, informs the DNS server (also server 402) of the network name and IP address assignments. Server NOA 402 determines whether a DHCP Decline is returned by client NOA 400. If a DHCP Decline is returned, server NOA 402 issues an alert to a user, requesting the user to determine why the configuration was rejected. Hence, paragraph 0066 does not state that the Matsuda arrangement determines if a candidate does not have the same operating characteristics as a predetermined operating characteristic of a first headless master computer entity, as required by claim 27.

Based on the foregoing, the independent claims previously submitted are not rendered obvious by the combination of Momona and Matsuda. Because the independent claims are improperly rejected, the dependent claims are allowable for at least the same reasons advanced

Application No.: 09/800,100**Docket No.: 30007696 US (1509-149)**

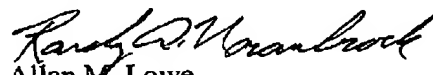
for independent claims 21, 23, 25 and 27. In addition, the foregoing analysis of paragraphs 0056 and 0064 of Matsuda indicates these portions of Matsuda relied upon to include the requirements of dependent claims 22, 24 and 26 do not disclose the requirement of these claims for the checking step to be performed before the slave computer candidate of a particular group joins that group. The office action relies on paragraph 0056 of Matsuda to disclose the requirements of claims 28, 29 and 30 for the operating characteristic of the first computer entity of claim 27 to the security, domain and configuration, respectively. However, there is no mention in paragraph 0056 of security, domain or configuration being operating characteristic of a master computer that is to be in a slave computer.

In view of the foregoing amendments and remarks, favorable reconsideration and allowance are respectively requested and deemed in order.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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Date: September 20, 2005

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